

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**JAMES D. JOHNSON, as next friend to  
Olivia Y., et al.**

**PLAINTIFFS**

**vs.**

**CIVIL ACTION NO.: 3:04-CV-251-TSL-FKB**

**PHIL BRYANT, as Governor  
of the State of Mississippi, et al.**

**DEFENDANTS**

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**JOINT MOTION FOR SUSPENSION OF SPECIFIC OBLIGATIONS**

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The parties file this Joint Motion for Suspension of Specific Obligations and in support of this Motion state as follows:

1. The parties are engaged in negotiations in an effort to resolve the issues in the Stipulated Second Remedial Order ("SSRO"), and hereby stipulate and agree that the date of October 17, 2016, in paragraph 14 of the SSRO be adjourned to December 5, 2016.
2. The parties further stipulate and agree that the following obligations in the Modified Settlement Agreement and Reform Plan ("MSA") and Interim Remedial Order ("IRO") are suspended as of the date the court approves this order, should the court approve it, until December 5, 2016:
  - a. Defendants' validation and reporting obligations to provide data and information to the Monitor under the MSA and paragraph 13 of the IRO;
  - b. Defendants' validation and reporting obligations to the Plaintiffs in the MSA; and
  - c. MSA Section II.A.2.a.7.

WHEREFORE, PREMISES CONSIDERED, the parties jointly request that this Court enter the Agreed Order for Suspension of Specific Obligations and for such other and further relief, in law or in equity, to which they may be entitled.

Respectfully submitted, this \_\_\_\_ day of October, 2016.

/s/ Kenya Key Rachal

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**CERTIFICATE OF SERVICE**

I, Kenya Key Rachal, do hereby certify that I have on this day, electronically filed a true and correct copy of the forgoing document with the Clerk of Court using the ECF system which sent notifications of such to counsel as follows:

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SO CERTIFIED, this \_\_\_\_\_ day of October, 2016.

\_\_\_\_\_  
/s/ Kenya Key Rachal